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4 *Attorney for Defendant*

5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

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7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 vs.

10 SHA-RON HAINES,

11 Defendant.

Case No. 2:16-cr-00137-JAD-GWF

STIPULATION AND PROPOSED
ORDER TO CONTINUE
SENTENCING HEARING
(First Request)

13 It is hereby stipulated and agreed, by and between Steven W. Myhre, Acting
14 United States Attorney, through Richard Anthony Lopez, Assistant United States
15 Attorney, and Andrea Luem, counsel for defendant Sha-ron Haines, that sentencing
16 currently scheduled for January 16, 2018, be VACATED and set for a date and time
17 convenient for the Court.

18 This stipulation is entered into for the following reasons:

19 1. The parties request a continuance of the sentencing date because the
20 Defendant's appointed counsel has an unresolvable scheduling conflict on the date
21 currently set for sentencing in this matter.
22
23

1 2. Defendant's counsel immediately informed the Government when she
2 learned of the conflict and the Government has no opposition to a continuance of the
3 sentencing date.

4 3. The additional time requested is not sought for purposes of delay, but
5 to allow the Defendant's counsel to be personally present for the sentencing in this
6 matter.

7 4. The defendant is in custody serving his sentence in the sex trafficking
8 case and does not object to the continuance.

9 5. This is the first request for a continuance of the sentencing date.

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11 DATED this 3rd day of January, 2018.

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13 Respectfully submitted,

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15 /s/ Andrea Luem
16 ANDREA L. LUEM, ESQ.
17 Nevada Bar No. 8844
18 400 South Fourth Street, Suite 500
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20 Telephone: (702) 600-8401
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22 **Attorney for Defendant**

23 STEVEN W. MYHRE
 Acting United States Attorney

/s/ Richard Anthony Lopez
 RICHARD ANTHONY LOPEZ
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

-oOo-

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 SHA-RON HAINES,

7 Defendant.
8

Case No. 2:16-cr-00137-JAD-GWF

9 **FINDINGS OF FACT**

10 Based on the parties' stipulation to continue the sentencing date, and good
11 cause appearing therefore, the Court finds that:

12 1. The parties request a continuance of the sentencing date because the
13 Defendant's appointed counsel has a scheduling conflict with another court on the
14 same date that is unresolvable.

15 2. Defendant's counsel immediately informed the Government when she
16 learned of the conflict and the Government has no opposition to a continuance of the
17 sentencing date.

18 3. The additional time requested is not sought for purposes of delay, but
19 to allow the Defendant's counsel to be personally present for the sentencing in this
20 matter.

21 4. The defendant is in custody serving his sentence in the sex trafficking
22 case and does not object to the continuance.
23

5. This is the first request for a continuance of the sentencing hearing in this case.


CONCLUSIONS OF LAW

6. Denial of this request for extension would result in a miscarriage of justice and deny the Defendant's the ability to have undersigned counsel, who has spent numerous hours with him in preparation for his sentencing hearing, personally present at the time of sentencing.

ORDER

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for January 16, 2017, at the hour of 9:00 a.m. be continued to February 6, 2018 at the hour of 9:00 a.m. in Las Vegas Courtroom 6D before Judge Jennifer A. Dorsey.

DATED this 4th day of January, 2018.


JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

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Dated: January 3, 2018

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